REMARKS

Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are pending and stand rejected. That rejection has been made final. Claims 6, 10, 25, 30, 32, 33, 38, and 40 have been cancelled. Claims 1-5, 7, 9, 11, 12, 17, 19, 21-23, 29, 31, 34, and 35 have been amended.

CLAIM REJECTIONS – 35 USC §102: In the detailed action, the Examiner states that Claims 1-18, 24, and 25 were rejected under §102 citing US Pub. 2001/0013947 to Van Der Linden. However, when explaining the §102 rejection, the Examiner addressed claims 19-23, 25-34, and 36-40. Moreover, when addressing Claims 1-18, 24, and 25 with respect to a §103 rejection, the Examiner admits that Van Der Linden fails to teach one or more limitations of each of those claims . By the Examiner's own admission, the teachings of Van Der Linden are insufficient to support a §102 rejection of Claims 1-18, 24, and 25.

The Applicants brought this oversight to the Examiner's attention in a response filed December 6, 2004. However, the Examiner failed to correct his mistake in the most recent office action. That being said, the Applicants will address Claims 19-23, 25-34, and 36-40 with respect to the §102 rejection and ignore Claims 1-18, 24, and 35.

Van Der Linden is directed to a method for electronically submitting documents to a reproduction center. Van Der Linden, Abstract. To that end a printer driver (16) is provided to generate a "temporary print file." Van Der Linden, [0038], [0039]. A "repro printer demon" (20) then causes the temporary print file to be transmitted to the reproduction center. Van Der Linden, [0040]. The reproduction center sends back a submission form (40). Van Der Linden, [0041]. The submission form (40) includes menus that allow a user to provide personal information and to select previously specified print options. Van Der Linden, [0042].

The submission form (40) includes a button (34) to submit personal information and selected print options to the reproduction center. Van Der Linden, [0045]. The submitted information is referred to as a job ticket and is associated with the temporary print file. Van Der Linden, [0052]. An operator at the

reproduction center, using a software tool, then manually schedules a print job for the print file according to the corresponding job ticket. Van Der Linden, [0055]. The software tool presents the operator with an interface that lists selected print options so the operator can manually identify and assign the print job to a "print engine" that has the necessary capabilities. Van Der Linden, [0056].

Claim 19 is directed to system for managing production requests and, as amended, recites the following elements:

1. a production client operable to receive a production request, the client comprising:
    a. a capture driver operable to capture the production request; and
    b. an interface translator operable to present first and second user interfaces, the first user interface having user accessible controls for selecting services for producing the production request, and the second user interface having user accessible controls for selecting one or more, if any, production devices capable of providing services selected through the first user interface;
2. a production server in electronic communication with the production client and operable to direct one or more selected document production devices to produce the captured production request with selected services, the production server comprising:
    a. a services engine operable to provide the production client with the first user interface, to receive selections made through the first user interface, to identify the one or more, if any, capable production devices, to generate and provide the second user interface to the production client, and to receive selections made through the second user interface; and
    b. a production engine operable to deliver the captured production request to a production device or devices selected through the second user interface.

Claim 19 recites a system that utilizes two user interfaces. The first is for selecting services and the second is for selecting production devices identified as being capable of providing services selected through the first user interface. Van Der Linden clearly does not teach or suggest this. Moreover, Van Der Linden does not teach or suggest a services engine or a production engine having the capabilities recited in Claim 19. Van Der Linden requires a reproduction center operator to manually identify a capable "print engine." Claim 19 recites a services engine that identifies one or more capable document production devices and generates a user interface with controls for selecting one or more of the identified devices. Van Der Linden simply does not teach or suggest a production engine that is operable to deliver the captured production request to a production device or devices selected through the second user interface – the user interface for selecting a capable document production device identified by the services engine.

For at least these reasons Claim 19 and Claims 20-24 and 26-28, which depend from Claim 19, are clearly patentable over Van Der Linden. Claim 25 has been cancelled.

Claim 29 is directed to a distributed document production system that includes a services engine and a production engine operating on one or more computing devices that are remote from a production client. The services engine is operable:

- to obtain a selection of one or more services for producing a production request captured by the production client;
- to identify one or more, if any, production devices capable of providing the selected services; and
- to obtain a selection of one or more of the identified production devices from the production client.

The production engine is operable to deliver the captured production request to a selected production device.

Van Der Linden clearly does not teach or suggest the services engine recited by Claim 29. As noted with respect to Claim 19, Van Der Linden requires a reproduction center operator to manually identify a capable "print engine." Claim

29's services engine identifies one or more, if any, production devices capable of providing the selected services. Furthermore, the services engine obtains a selection of one or more of the identified production devices from the production client. Van Der Linden simply does not teach or suggest a services engine that can perform these tasks.

For at least these reasons, Claim 29 is clearly patentable over Van Der Linden as are Claims 31, 34-37, and 39 which depend from Claim 29. Claims 30, 32, 33, 38, and 40 have been cancelled.

CLAIM REJECTIONS – 35 USC §103: The Examiner rejected Claims 1-18, 24, and 35 under §103 as being unpatentable over Van Der Linden.

Claim 1 is directed to a method for managing electronic document production over a computer network and recites the following acts:

- presenting, to a remote computing device, a first user interface with user accessible controls for selecting services for producing a production request captured on the remote computing device;
- presenting, to the remote computing device, a second user interface having user accessible controls for selecting one or more, if any, document production devices identifies as being capable of providing services selected through the first user interface;
- merging the selected services and the captured production request into a production plan; and
- delivering the production plan in a device specific format to one or more selected document production devices selected through the second user interface.

Claim 1 recites a method that utilizes two user interfaces. The first is for selecting services and the second is for selecting production devices identified as being capable of providing services selected through the first user interface. Van Der Linden clearly does not teach or suggest this. Van Der Linden requires a reproduction center operator to manually identify a capable "print engine." Claim 1 recites acts in which one or more capable document production devices are

identified and a second user interface with controls for selecting one or more of the identified devices is generated. Van Der Linden simply does not teach or suggest these acts.

For at least these reasons, Claim 1 is clearly patentable over Van Der Linden as are Claims 2-5, 7, and 8 which depend from Claim 1.

Claim 9 is directed to a computer program product for managing electronic document production over a computer network. The product comprising a computer useable medium having computer readable instructions for performing the method of Claim 1. For the same reasons Claim 1 is patentable, so are Claim 9 and Claims 11-18 which depend from Claim 9. Claim 10 has been cancelled.

Claim 24 distinguishes over Van Der Linden based at least on its dependency from Claim 19.

Claim 35 distinguishes over Van Der Linden based at least on its dependency from Claim 29.

Conclusion: The foregoing is believed to be a complete response to the outstanding Office Action. Claims 1-5, 7-9, 11-24, 26-29, 31, 34-37, and 39 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,
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